

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division



REBECCA REED,
For herself and on behalf of all
similarly situated individuals,

Plaintiff,

v.

ICON FITNESS, INC.,

and

ARVEST BANK,

and

DENT-A-MED, INC., d/b/a
HC Processing Center,

Defendants.

) Civil Action No.: 3:08cv547

) JURY TRIAL DEMANDED

DECLARATION OF CLASS ADMINISTRATOR, MATTHEW E. POHL

I, MATTHEW E. POHL, declare as follows:

1. I am President of Class Action Administration, Inc. ("CAA"). The Defendants in the above-captioned case (the "Class Action") retained CAA on July 16, 2009 to administer the class action settlement. I have personal knowledge of the following facts and, if called as a witness, could and would competently testify to them.

2. On or about April 16, 2010, CAA received an electronic class list from the Defendants. I understand that the list included the most current mailing information available. The data provided included each class member name and mailing address. There were a total of 8,806 valid records in this list ("Class List").

3. Before mailing the court-approved "NOTICE OF PROPOSED CLASS ACTION SETTLEMENT, FAIRNESS HEARING, AND RIGHT TO APPEAR" ("Notice"), CAA updated

the addresses on the Class List using the national change of address ("NCOA") database maintained by the U.S. Postal Service. For addresses that NCOA showed as being highly likely to be undeliverable, CAA performed additional address research using credit reporting databases.

4. Prior to June 24, 2010, CAA established a settlement website with the URL www.ReedCreditSettlement.com. As of August 19, 2010, CAA had tracked over 440 web page and document views on the website.

5. Prior to June 24, 2010, CAA established a toll-free number which class members could call to find out information about the case and have their questions answered by CAA Associates. As of August 19, 2010, CAA Associates have fielded nearly 100 incoming calls to the toll-free number.

6. On June 24, 2010, CAA mailed the Notice to 8,806 class members.

7. As of August 19, 2010, CAA has received 1,770 Notices returned as undeliverable. CAA was able to forward 69 of these to new addresses provided by the United States Postal Service. CAA performed additional research using credit reporting databases and was able to locate new addresses for an additional 862 class members. This means that the net undeliverable rate for the Notice mailing is 9.5%. This rate of undeliverable notices falls within the range of 8% - 12% CAA typically experiences with consumer class action notice mailings.

8. As of August 19, 2010, CAA has received one opt outs from class members. Exhibit A lists the name of person who opted out of the settlement.

9. No objections have been received by CAA as of the date of this declaration.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 20th day of August, 2010, at Westminster, Colorado.


MATTHEW E. POHL

Class Action Administration, Inc.

Exhibit A

Reed v ICON Fitness, Inc. et al.

Report of Opt Outs

Claim Form ID	Date Rcvd	Name	Address	City, State Zip
900001	8/2/2010	TERA HOOKER	426 N JACKSON ST	GENESEE, ID 83832-9635

Opt Outs: 1